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April 22, 2011

Kenneth Kirkey
ABAG Planning Director
Association of Bay Area Governments
101 – 8th Street
Oakland, CA 94607

RE: Sustainable Communities Strategy - Initial Vision Scenario

Dear Ken:

At their April 20, 2011 meeting, the Larkspur City Council heard a staff presentation on the One Bay Area Sustainable Communities Strategy – Initial Vision Scenario. First, the City wants to acknowledge the staff of ABAG and MTC for their work on the Sustainable Communities Strategy and we recognize it is a difficult task that has to be completed within an exceptionally short time period. In response to the Initial Vision Scenario, Larkspur has the following comments:

- 1. The City finds the household projection of 341 units for Larkspur to be reasonable in terms of what is planned for Larkspur and given the physical constraints of the community in terms of its topography and lack of available undeveloped land.
- 2. The City notes that the RHNA numbers projected 382 units and that is a number that has been accommodated in the City's Housing Element and reflects the constraints noted above.
- 3. The City also points out that the infrastructure, whether it is for private and commercial vehicles or public transit, is very limited in most Marin communities by one major road in and out. The currently proposed Highway 101/Greenbrae Interchange project would correct unsafe on and off ramps, but would not increase the infrastructure for moving people in and out of the central portion of the community or to other areas of the region. Essentially, the area within the ½-mile radius of the proposed SMART train station and the existing Ferry Terminal is built out with some, but very limited, potential for the development of additional housing beyond what has been built and approved (but not built) for the area.
- 4. Larkspur is not endorsing the projections for San Rafael, but supports the concept of a City Center for Marin County and concurs with San Rafael as the logical choice for that Center. This is based on a number of factors including San Rafael's past history of development including its requests to be a Priority Development Area, its existing

infrastructure in terms of access in and out of the City Center area, the recent investments by State and regional agencies in highway improvements, and the timing for the future SMART station development. Relative to most other counties, San Rafael as a County Center has by far the fewest households. Larkspur also agrees that the "down payment" for serving as that center should be discussed and there should be monies to address further impacts on infrastructure, transit, schools, and other services.

- 5. The City notes that, as an unconstrained scenario, the Initial Vision Scenario lists San Quentin (an unincorporated portion of the County) as a Growth Opportunity Area with a growth projection of 1,517 households. Though San Quentin is within the City of Larkspur's sphere-of-influence, those households would only appropriately be allocated to the City if the area were to be annexed and this would be unlikely in a "constrained" scenario where the State prison remains in place. Further, the City notes that the County has additional growth potential within the unincorporated urbanized 101 corridor, which is where the 1,517 household growth should remain.
- 6. As discussed with ABAG staff, the 2010 Larkspur household number of 8,038 should be significantly lower. Please note that Projections 2009 listed Larkspur's households at 6,160 for 2005 and 6,180 in 2010. We understand that the job numbers are currently being revised so we have reserved comment until the new numbers are presented.

On behalf of the Larkspur City Council, thank you for the opportunity to provide input into the process.

Sincerely. Many Laufman

Nancy Kaufman

Planning Director

C: Jackie Reinhart, ABAG Larkspur City Council Dan Schwarz, City Manager

Robert Sinnott, Deputy City Manager